

Passport sales: how island microstates use strategic management to organise the new economic citizenship industry

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ABSTRACT: Passport sales programmes have concentrated in island microstates. This paper analyses organisational factors and strategic management leading to comparative success or failure of these economic citizenship programmes. Each passport sales business in the Pacific islands has had a brief life—the majority continuing for a few years, at most. They evolved within a precarious and disorderly environment—frequently with a fast ascent, before they crashed. Collapse has often been followed by similar short-lived schemes in the same Pacific island country. Yet other passport sales enterprises in Caribbean and European island microstates endure and even thrive. The comparative success or failure of passport sales ventures around the world depends significantly on how they are organised. This paper outlines similarities in the organisational styles of the Pacific island programs—as isolates. In examining programmes elsewhere in small island states in Europe and the Caribbean, it analyses the types of organisations that are more likely to lead to a more enduring success—foreign professional agencies and subcultures.

Keywords: globalisation, economic organisation, island microstates, MIRAB, passport sales, SITE/PROFIT, strategic management

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Introduction

The innovative strategic management perspective in island studies suggests that small island countries prosper to the degree that they implement effective organisational strategies to take advantage of unusual niche opportunities offered by the international political economic environment (Baldacchino, 2006a, 2006b, 2007a, 2007b, 2010, 2015; Baldacchino & Bertram, 2009; Bertram, 2006; Bertram & Poirine, 2007). Strategic management is about optimally positioning organisations in relation to stakeholders and rivals—developing strategies that suit their (often unique) natures and environments to secure competitive advantages. Island microstates succeed to the extent that they supply what people and organisations in continental countries want.

Island microstates develop innovative forms of sovereignty, unique status arrangements that challenge mainstream (and mainland) orthodoxies and models. In a number of niche industries, they meet needs better than large countries (Baldacchino & Bertram, 2009). Taking advantage of globalisation by “using local rules to tap non-local resources” (Drucker, 1986, ctd. in Baldacchino, 2010, p. 73, p. 91, p. 190) is the most useful managerial strategy for island microstates. This article considers how small island states organise their lucrative passport sales (or economic citizenship) programmes.

Selling passports and citizenship is an emerging industry concentrated in small island tax havens or offshore financial centres. Passport sales revenues reached an estimated US\$2 billion in 2016 (CBS, 2017). Commoditised or economic citizenship is a new product, entering a new

market with new sources of supply and new forms of organisation, centred in island tax haven microstates that became politically independent after the Second World War.

This new industry's success is driven by globalisation, the rise of free market principles, and erosion of mononational, communal, and state-building concepts of citizenship. Global capitalism brings unprecedented mobility and fluidity and forced the invention or discovery of substitutes for conventional passports for many rich or relatively affluent people, especially from emerging countries with passports granting few powers of action. A passport of convenience from an island microstate confers expanded visa-free entry and residence rights in rich countries and regions, lower taxation, and other instrumental advantages. Passport purchasers buy 'shadow nationality' (Ronkainen, 2011), a touristic rather than rooted experience of citizenship—requiring (almost) no residency, participation, or loyalty.

This paper analyses the organisational factors that have led to the comparative success or failure of passport sales programmes. The Pacific island country experience provides valuable lessons. Each passport sales programme in Pacific island countries has had a relatively brief life, the majority continuing for a few years, at most. They have evolved within a precarious and disorderly environment, frequently with a fast ascent, before they crashed. Collapse has often been followed by similar short-lived schemes in the same Pacific island country. Yet other passport sales programmes in Caribbean and European island microstates have persisted and even prospered. This paper suggests that the comparative success or failure of passport sales ventures around the world depends significantly on how they are organised. It is primarily about the organisation of supply, not demand. The paper outlines similarities in Pacific island country programmes' organisational styles. It analyses the types of passport sales programme organisation in other island microstates that have led to more enduring successes or best practices.

Passport sales programmes' progress depends on how they are organised—either as *isolates*, *foreign professional agencies*, or *subcultures* (van Fossen, 2012). These terms refer to how particular passport sales programmes and entire offshore financial centres are organised. This paper develops and analyses these three organisational models.

Isolate

Isolates are apart, operating separately and disconnected from the passport sales programme community. These include passport sales in the Pacific island countries of Tonga, the Marshall Islands, Nauru, Vanuatu, Samoa, and Kiribati. This paper concentrates on these Pacific island country schemes, although similar isolate passport selling ventures may have existed in other parts of the world as well. Belize (1995–2002) and Grenada (1997–2001) also appear to have had isolates selling passports. I am planning more research into these cases.

These isolates have not been members of associations coordinating economic citizenship nor have they cooperated with passport sales programmes in other countries. These isolates have had offshore financial centres, but selling passports has been mostly disconnected or (at most) weakly linked to other offshore activities. This situation limited their support networks and access to peer evaluation of their activities, additional opportunities, and strategies for dealing with metropolitan governments hindering their passport sales programmes. This restricted their passport sales programmes' sophistication. They have often been erratic, providing one-off, discrete, and poorly integrated services.

An isolate's government may be a passport 'wholesaler' to one or more foreign retailers (frequently of uncertain reliability), or it may market these itself or through a domestic retailer. Honorary consuls or diplomats in Asia (particularly Hong Kong) have been very important retailers, as have a number of micro-entrepreneurs there. Sometimes local politicians or bureaucrats sell passports for campaign contributions, favours, or outright payoffs. The government may do little effective monitoring of retail dealers. The isolate's extremely low level of 'red tape' may appeal to some clients, at least initially or in the short term. Retailing activities tend to be

distinct and uncoordinated, with little mutual assistance between them. Few rules or standards may be imposed. Performance may be largely invisible. The passport-issuing government's disciplinary measures against illegitimate operations may be weak. Some passport retailers may ignore, evade, resist, or disobey any governmental attempts to restrain, discipline, or audit their activities. According to a number of accounts, many retailers in isolate schemes have not remitted appropriate passport sales proceeds to the Pacific island country governments issuing the passports.

If the isolate programme is official and institutionalised (rather than being informal or unlawful), the government may establish a special entity or sovereign wealth fund to receive the income from the passport sales programme (such as the Tonga Trust Fund that received profits from Tonga's passport sales). Most frequently, however, the benefits and responsibilities in relation to official programmes are supposed to go to the general accounting budget or to some pre-existing government agency, which may not grant the passport sales programme great importance (as in the Marshall Islands and Kiribati). Much of the income from passport sales may never reach the government—because the proceeds are stolen or the sales are unlawful. The isolate's fringe character limits avenues to reputable legal, financial, and accounting services—losing substantial funds through bad governance, lack of transparency, ineptitude, poor advice, theft, fraud, or corruption.

Isolates are likely to attract racketeers (foreign or domestic) trying to retail wholesale passports. Unlike foreign professional agencies (considered below), these promoters lack professionalism. Even if they are given monopolies, as in Tonga and Nauru, they may not provide significant income for the Pacific island country itself—channelling substantial profits toward their personal or familial accounts rather than to general public funds.

Transparency has been absent in isolate Pacific island programmes. The Tonga Trust Fund was exempted from public accounting. Its monies were held apart from the government's ordinary revenues. The media suggested that other hidden foreign accounts held more sales money. Between 1982 and 1996 about 8,450 Tongan passports were sold, generating gross revenues of approximately US\$92.95 million or 6.5% of the country's gross domestic product in these years (see Table 2; van Fossen, 2007). Tens of millions of dollars of profit have been derived from passport sales and deposited in the Tonga Trust Fund, where they were mixed with about US\$2 million of income from Tonga's leasing of geostationary space to provide a flag of convenience for satellites between 1996 and 1999 (van Fossen, 1999, 2007). Only small proportions of these large amounts (most of which were held in the US) went to the kingdom's internal development (Table 1) and most of the funds that have been forthcoming were in the form of loans, not grants—so that in 2000 US\$12,022,050 of advances to the Tonga government were held as Tonga Trust Fund assets (*Tonga Government Gazette*, 2001). There has been little domestic legislative control over these ventures. Most people in Tonga's political circles believe that the Tonga Trust Fund has been ultimately controlled by, and for, the Tongan royal family's benefit.

In the Marshall Islands in May 2002 the Attorney General's Office lamented that there were no official records of sales through agents or of revenues (*Marshall Islands Journal*, 2002). In Vanuatu it was impossible to determine how many ordinary passports were granted to foreigners; at least 29 diplomatic and 42 official passports had been issued (only six of these being formally accepted by a receiving country). In both countries substantial passport sales appear to have come from prominent politicians ordering bureaucrats to issue the documents, with a few cases of bureaucratic underlings pursuing their own personal ends.

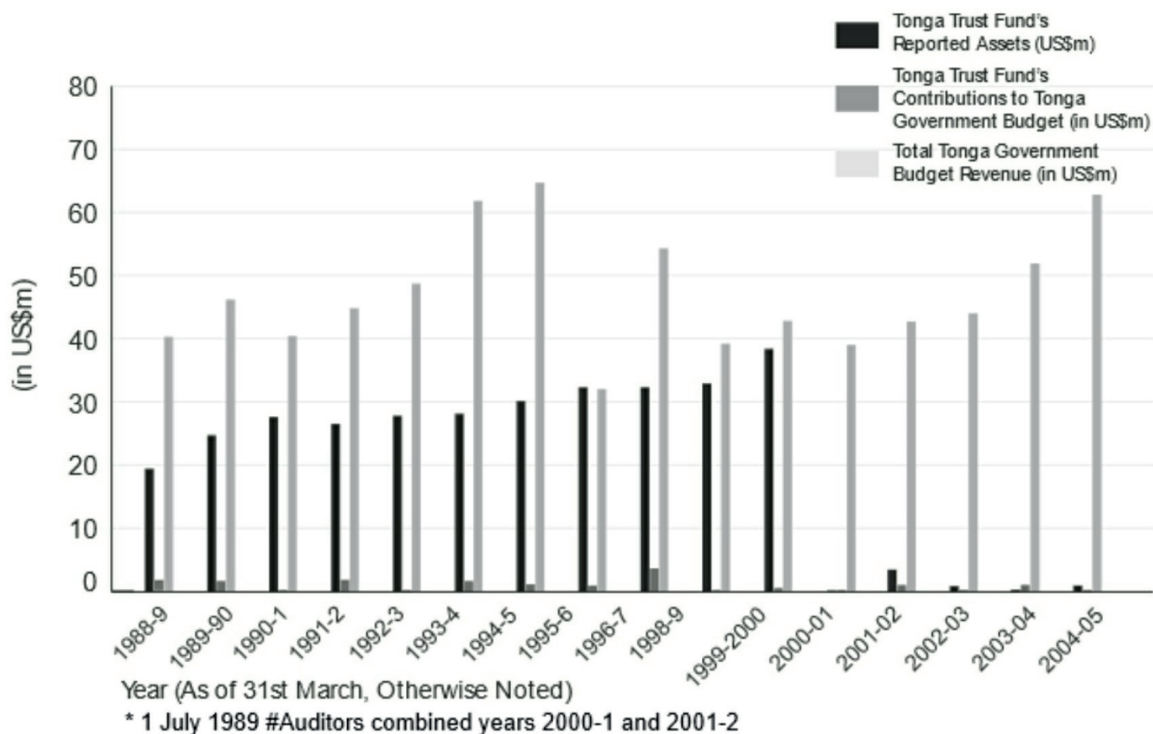
Tonga Trust Fund audited accounts were only published after massive protests by the pro-democracy movement there and court orders to publish. Generally, however, in isolates prosecutors fail to pursue cases against those benefitting illicitly from passport sales programmes. Where there are court decisions or ombudsman's reports against those involved in unlawful passport issuance in Pacific island isolates, the decisions and reports have often been ignored or evaded.

Promoters in isolates frequently see passport sales as a way to acquire considerable income for relatively little effort and often improvise relatively undefined, formless, and temporary networks for their passport transactions. A small number of insiders may gain substantial wealth,

even if they lose a portion of their profits in a reverse windfall (such as the Tonga Trust Fund's extraordinarily poor investments).

In Tonga a scandal developed in 2001 and 2002 when it was revealed that over US\$30 million of the Tonga Trust Fund assets had been lost in buying high risk and fraudulent investments (including life insurance policies speculating on influential Americans' early deaths). These had been mostly purchased under the advice of an American manager, Jesse Dean Bogdanoff, who doubled as the Tongan king's court jester. Bogdanoff and two co-accused reached a secret out-of-court settlement in February 2004, when they allegedly agreed to pay the Trust Fund about one million US dollars. There has been no real public accounting since 2005 for whatever assets may remain in the Tonga Trust Fund.

Table 1: Assets of the Tonga Trust Fund.



Sources: International Monetary Fund, Tonga: Staff Report, 9/10/98, 16/1/03, 17/5/06; Tonga, *Budget Statement for the year by the Minister of Finance 1989-1996*; National Reserve Bank of Tonga, *Quarterly Bulletin 1993-2006*; *Report of the Minister of Finance 1997, 1998*, *Tonga Chronicle* 3/6/99; *Tonga Government Gazette* 28/10/92, 26/5/93, 31/96, 29/2/96, 30/6/97, 26/2/98, 31/7/98, 10/8/99, 29/9/00, 18, 21/9/01, 22/11/02.

Popular concerns about theft and improper accounting of proceeds from isolate passport sales programmes in Tonga and the Marshall Islands have been overshadowed by the greater local concern with the long-term consequences of large influxes of Chinese passport holders and their quick ascent in local business (particularly retail trade). The (ultimately false) assumption that passport purchasers would not settle in the issuing country helped convince those domestic interests who benefited that the schemes could remain secret. Yet this secrecy destabilised the schemes. Passport sales are very sensitive in any island state. Generally islanders are preoccupied with issues of migration, whether immigration or emigration, and are frightened of being flooded by migrating continentals (McCall, 1994, pp. 4-5).

In the Marshall Islands the scheme generated serious secondary problems—including Asian illegal aliens and over-stayers without Marshalls passports on one-month tourist visas who worked

in passport purchasers' businesses for years (many without pay). It was difficult and expensive for the government to apprehend, try, and deport them. In October 2003 the Marshall Islands Assistant Attorney-General, Jack Jorban, insisted that passport sales had distinctly marginalised indigenous Marshallese and Americans, so that they no longer controlled the country's economy (van Fossen, 2007).

Pacific islanders, believing that passport sales were illegitimate, became hostile toward immigrants thought to have purchased citizenship—creating insoluble conflicts, particularly in Tonga. A large-scale riot in Tonga's capital of Nuku'alofa on 16 November 2006 especially targeted larger Chinese-owned businesses that had appeared since the passport sales programme began and enterprises owned by the passport-selling royal family. Attacks there caused US\$60.5 million of damage (*Pacific Islands Report*, 2006). Many Tongans expressed concern about the uncertainties that the programme had brought to their longer-term prospects and their nation's future.

In 2016 Tonga's Prime Minister 'Akilisi Pohiva decried the continuing illegal sales of ordinary and diplomatic passports by corrupt officials. He expressed frustration that only lower level functionaries were being arrested. Pohiva accused some members of the local power elite, including his predecessor former Prime Minister Lord Tu'ivakano (currently Parliamentary Speaker), of having unlawfully pressured immigration authorities to illegally issue passports, primarily to Chinese citizens. Pohiva cited Sien Lee and his wife, who received 15 ordinary passports and 7 diplomatic passports since 2003. Pohiva alleged that illegal passport sales were linked to the methamphetamine ('ice') trafficking that was ravaging the country and region and to an "onslaught of transnational crime" afflicting Tonga. The New Zealand government expressed concern about Tonga's passport situation (Ensor & Wall 2016; Pacnews, 2016a, 2016b; RNZI 2016a, 2016b; Wall & Ensor 2016).

Generally, the least appealing clients (frequently oriented toward shadowy activities) are inclined to use isolates, which may be their only option. The isolate's predicament is often noticed by other countries and international organisations and leads to condemnation. Often isolates' passports 'work' for clients, but sometimes they do not 'work'. Even (and perhaps especially) when they 'work' for dubious purchasers (for example, for facilitating the international mobility of criminals, terrorists, and unwanted migrants) they raise legitimacy questions. Their direct or indirect role in taking advantage of third parties pulls down passport sales programmes' reputation in general and prompts calls for more regulation.

Vanuatu passport holders included people with criminal or dubious histories, or no recorded address. Vanuatu's international status was lowered and some countries (e.g., Canada) reinstated visa requirements for Vanuatu's nationals (*Vancouver Sun*, 2001).

Nauru's passport sales programme started in 1998, notwithstanding Australian threats to stop recognising Nauru's passports—affecting many Nauruans living in Melbourne. Foreign governments' antagonism grew after the 11 September 2001 terrorist attacks. Some alleged terrorists carried Nauru passports. Two suspected terrorists from the Turkestan Liberation Organization were seized carrying Nauru passports bought without any background checks. Andriy Simonyan, an alleged terrorist from Azerbaijan, purchased a Nauru passport for US\$15,025 on 26 October 1998 and moved to Hangzhou, China, where he was apprehended in 2003 after allegedly stabbing a US citizen and preparing a terrorist offensive on Americans. In February 2003 two suspected al-Qa'ida agents holding Nauru passports were captured in Malaysia. The US forced the hand of Nauru's new President Bernard Dowiyogo. He signed an executive order terminating his country's passport sales and offshore banking ventures on 27 February 2003, while in a Washington, DC hospital for a heart condition; he died ten days later.

The credibility of all passports from Nauru, the Marshalls, Tonga, Samoa and Vanuatu has been harmed, as they have been associated with dubious purchasers. In 2015, for example, American authorities refused to accept a Marshall Islands passport as a valid identity document for a naturalised citizen to enter the US (*Marshall Islands Journal*, 2015). Foreign countries

restructured visa restrictions and innocent citizens-by-birth were challenged, denied entry, or delayed in their journeys.

Isolates' passport sales activities may be burdened by contradictory goals, as they may oppose other, more important objectives of the isolates' nation-state (for example, maintaining a favourable global reputation or co-operating with powerful metropolitan states). Most passport sales programmes in isolates have bad images. Frequently scandals drive them to curtail their operations. Isolate programmes typically have low accountability to the general citizenry and even to their clients. They often run into trouble when powerful foreign governments or mass media coverage raise an alarm, pressuring political leaders to respond.

Domestic opposition appears particularly after local independent media, democratically elected political leaders, and whistleblowers reveal the schemes' clandestine operations. This opposition in isolates has been personified most dramatically by the Tongan Pro-Democracy Movement and the Vanuatu Ombudsman's Office—which the local independent media portray as heroic crusaders, fighting against corruption and the devaluation of their countries' citizenship. There is, however, no guarantee that whistleblowers and their political reformer allies will be victorious in the end. Tony Audoa, Nauru's former Justice Minister, found that passport sales had harmed Nauru's international image and that politicians, illegally receiving income from sales, quashed police investigations. Concern was expressed that powerful people who benefited from sales might sway the outcome of Nauru's 3 May 2003 election, in which the scheme was a significant issue, and continue to lobby for its reintroduction.

Isolate programmes often suffer from discontinuity and scandal. Just as the oldest Pacific island passport sales programme (Tonga's) had a number of discrete versions, so Vanuatu's first official venture has been plagued by irregularities in its short history. Vanuatu suspended its original scheme (Capital Investment Immigration Plan) in May 2015 after it had operated for less than two years. There were concerns about its allegedly not meeting promised revenue targets and the quality and quantity of applicants. A shadowy Hong Kong retailer allegedly proposed that it sell citizenships to Chinese applicants such as a Triad member, a financial criminal, and a money launderer and member of an illegal drug trafficking organisation—along with their families. Pressure was allegedly exerted on Vanuatu's government to approve the applications. The Capital Investment Immigration Plan was suspended on 11 June 2015 and immediately replaced by another scheme (Honourary Citizenship), with Pacific Resource Group operating as retailer for greater China (including the PRC, Hong Kong, Taiwan, and Macau), as well as Russia. Vanuatu's government stated that it revoked about thirty citizenships that had been granted illegally and suspected that it would revoke more. On 21 March 2016 the original Capital Investment Immigration Plan project was reactivated—despite continuing concerns about false advertisements, and illegal collection of funds for unauthorised Vanuatu passport sales to Chinese. The unsanctioned advertisements stated that applicants did not need to explain the source of their funds. A third avenue to citizenship, a Real Estate Option Plan, proposed by Vanuatu Migration Services Ltd., was approved by the government on 2 September 2015 (Garae, 2015; Vanuatu, 2016; Willie, 2015a, 2015b).

There have been severe conflicts between the retailers of the three programmes. On 22 December 2015 Vanuatu Registry Services of Hong Kong lodged a civil lawsuit for breach of contract and conspiracy (in relation to weakening its privileged position within the Capital Investment Immigration Plan). It litigated against the Vanuatu government, PRG (Pacific Resource Group) Consulting of Hong Kong, Vanuatu Migration Services, as well as former Prime Minister Sato Kilman, former Attorney General (currently Opposition leader) Ishmael Kalsakau, Henry Tamashiro (Director of Immigration), and Henry Bogiri (former Director of Internal Affairs). The local media were keen to follow the case, in view of the widespread popular opposition to passport sales. As the case was still pending in court, in late November 2016 Opposition Leader Kalsakau complained that substantial passport revenues were unaccounted for. Furthermore, he claimed that Prime Minister Charlot Salwai had approved still another (a fourth)

passport sales programme ('The Contribution Program') in October 2016, signing an agreement with a mysterious one-director shell company (Joshua, 2015, 2016; Makin, 2016; Vanuatu, 2015).

A major scandal broke, indicating the reputational damage done by illegal Vanuatu passport sales before the official programmes started. In March 2016 in the Philippines a Vanuatu passport was found on Kim Wong, aka Kam Sin Wong, after he was accused of being the mastermind of a scheme that electronically stole almost US\$81 million from the Bangladesh Central Bank's account at the US Federal Reserve Bank of New York the previous month. By December 2016 Wong had returned only US\$15 million of the US\$35 million that he admitted receiving from the money stolen from Bangladesh's central bank—leaving the other US\$66 million still missing. On 23 August 2001 Wong had been called before a Philippines Senate Committee, accused of being the conduit to the illegal drug mafia for his friend (and former Philippines National Police Chief) Senator Panfilo Lacsin. Wong and Lacsin denied the accusations and neither was successfully prosecuted. Wong, a Chinese national despite living in the Philippines for about fifty years, reportedly used his Vanuatu passport for entering and leaving the Philippines since 2009 (Antiporda & Canlas, 2016; Cababallo, 2016; Canlas, 2016; *Financial Express*, 2016; Lopez, 2016; Mogato & Morales, 2016; Punay, 2016). These scandals and questions about whether Vanuatu's government still needs passport revenues for the country's economic rehabilitation after cyclone devastation in 2015 add uncertainty about the future of the country's official passport sales programmes.

Samoa's Citizenship Investment Bill was proposed by the ruling party in 2014 and quickly became controversial. The general public rejected the passport sales programme—citing fears that foreign investors (who would presumably be mostly or exclusively Chinese) would threaten local businesses and access to land. A minority felt that the passport sales programme was necessary to attract the most productive investors to Samoa. Prominent local lawyers questioned the applicants' background checks' adequacy and the process's integrity in face of evidence of misuse of public funds at the highest levels. They wondered why the bill was created by the Ministry of Commerce, Industry and Labour. They emphasised the absence of anti-corruption legislation in the country, which had not signed UN and OECD conventions against corruption and bribery. Samoa's parliament passed the bill in October 2015, but formulation of relevant regulations was delayed. The parliamentary opposition stated that a 2016 amendment proposed by the government would dangerously extend citizenship to two additional generations of the passport purchaser's family—threatening indigenous Samoans' control over their land and economy (Polu 2015; RNZI, 2015; Samoa, 2014a, 2014b: pp. 3–4; *Samoa Observer*, 2015; Tupufia, 2016; US, 2015).

From potential clients' standpoints, Samoa may not be attractive. The minimum investment is 4 million Samoan Tala (about US\$1.5 million), there are bureaucratic hurdles to overcome, and citizenship is only granted after three years—with a minimum residency of 15 days a year (Samoa, 2014a). By contrast, Vanuatu citizenship can be obtained by paying about US\$200,000 for honorary citizenship or about US\$300,000 (US\$260,000 in investments and US\$40,000 in fees) for Capital Investment Immigration Plan citizenship. Only a brief visit to Vanuatu is required. The official Samoan scheme may be stillborn.

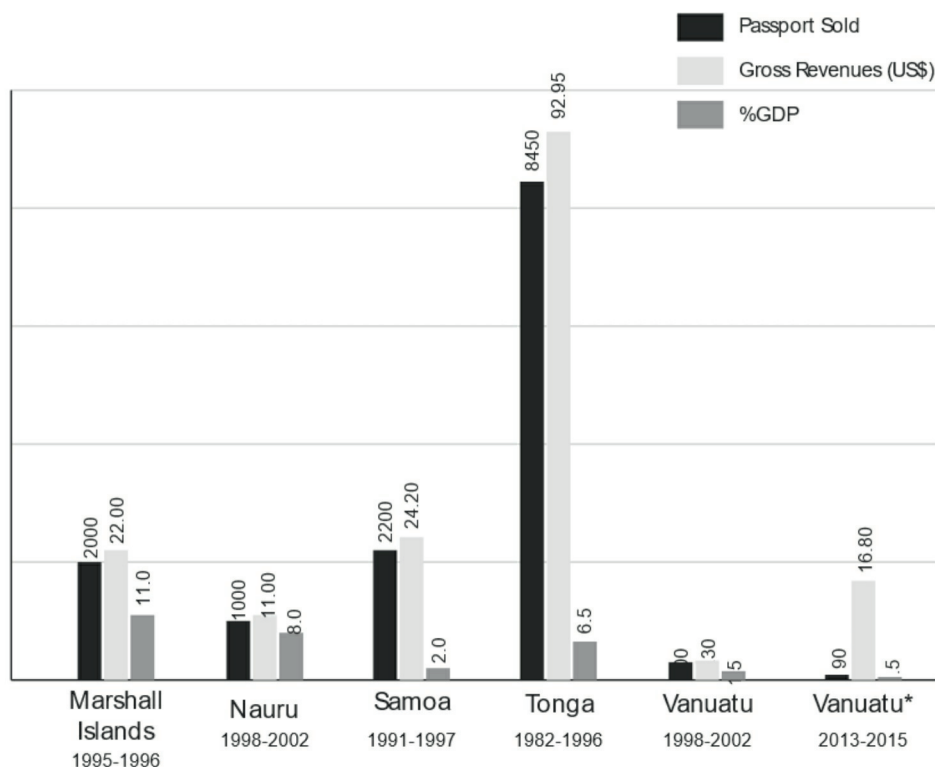
Most passport sales programmes in isolates are entirely or all but abandoned relatively soon after their inauguration; substantial numbers of passports may be cancelled. Exposure of hidden details by the media and by democratic interests demanding transparency led to invalidation of many passports sold by Pacific island isolates because sales were unlawful, some purchasers were disreputable, and secrecy concealed corruption. The Marshall Islands offer a case in point. Assistant Attorney-General Jack Jorban said that almost every purchased passport was issued unlawfully—and could be cancelled, and that Cabinet had not approved any passport sold below US\$100,000, as required by law. Jorban stressed that purchased passports were only identification documents and not proof of citizenship (*Marshall Islands Journal*, 2003).

Cheating and opportunism (with frequent misrepresentation by sellers and numerous illegal sales) generate high transaction costs. Most unlawful passports are not renewed—with subsequent write-offs for buyers. In the isolate schemes examined here there are few if any binding

agreements, official contracts, durable arrangements, proper supervision procedures, or usable enforcement practices (which all lower transaction costs). Instead, isolate passport sales programmes assumed a form which historically has thwarted success in economies, politics, and societies world-wide. Characteristically corruption abets elite enrichment—without negotiations with citizens to extend more power, democracy, or resources to them in exchange for revenues—for example, in the form of schools and hospitals (OECD, 2014).

However, an isolate passport sales programme can generate significant revenues during its relatively short active lifespan—for example, 11% of the Marshall Islands gross domestic product (GDP) over two years (see Table 2 for Pacific island country isolates’ cases).

Table 2: Passport sales of Pacific Islands isolates.



* Legal sales from September 2013 to September 2015 through Vanuatu’s Official Capital Investment Immigration Program and Honorary Citizenship Program only.

Sources: International Monetary Fund, *Vanuatu*, 2013–2015; van Fossen, 2007.

The repeated failures of isolate passport sales programmes trigger irritation, accusations, and perplexity about the issued passports’ status and the proceeds’ destination. Closing a programme in an isolate is often a device for getting it off the political agenda and shielding the people involved from further investigations and media attention. The isolate programme’s country has a bad reputation for a while (leaving a number of clients who feel victimised and citizens with more restricted travel options). Yet this stigma is likely to fade (but not disappear) over time. This reopens possibilities for a new round of profitable passport sales, at least on a small scale or if they can be hidden. While one passport sales programme may disappear in an isolate, another may arise. Frequently the same isolated organisational arrangement is used in the new venture, with the same chronic insecurity and unpredictability that are detrimental to passport sales programmes’ success over the longer term.

Passport sales in isolates still happen. Politicians, government workers, and other insiders may extract considerable unearned profits from sales and they may continue to issue passports privately even where there has been the establishment of legislatively ratified official programmes that are

designed to provide substantial funds to the government. A few members of the elite can receive high incomes (for little cost) by undercutting the prices that are charged by the official programmes.

Foreign professional agencies

St. Kitts and Nevis (from 2007), Grenada (from 2013), Malta (from 2014), Dominica (from 2014), and St. Lucia (from 2016) have operated their passport sales programmes most often through an authorised foreign professional agency. The foreign professional agency has a contract or concession from the government and shapes the scheme's legal and managerial structures professionally. The foreign professional agency also supplies daily administrative services, such as promotion and marketing and receiving, screening, and recommending applications. The foreign professional agency may be the exclusive private company or merely the dominant force shaping a country's passport sales programme—and there may be numerous unrelated and subordinate sales organisations in many parts of the world. These programmes are managed primarily from the agency's headquarters in another country, although the foreign professional agency also retains an operational office in the passport selling country itself. Henley & Partners, with its registered base in the Jersey offshore financial centre, has moulded the St. Kitts and Nevis (from 2007 to 2013) and Malta programmes. London's CS Global Partners has been the only official consultant and central marketer for Grenada's scheme since 2013. CS Global is also responsible for creating major structural changes to Dominica's scheme in 2014 and served as the foreign professional agency for St. Kitts and Nevis since 2013. CS Global shares substantial power over St. Lucia's venture with Montréal's Arton Capital.

The foreign professional agency seriously endeavours to connect the country's passport sales programme with similar programmes in other jurisdictions and with the international passport and visa regulation system on favourable terms. The foreign professional agency provides the passport selling country with significant expertise, instruction, support services, customers, opportunities, and promotion for its programme, as well as intellectual justifications, political strategies, and professional lobbying for dealing with actual or potential challenges.

The foreign professional agencies' professionalism means that they have direct access to expert lawyers, accountants, and other professionals, but the services of less expensive passport selling foreign professional agencies may be somewhat 'McDonaldized' (Ritzer, 2004), highlighting quick, dependable, stable, economical, and somewhat anonymous service, where customers understand what to expect. The foreign professional agency ordinarily makes concerted efforts to continue good relations with its customers, while the isolate may sell temporary, one-off passports to random customers (whose passports are often not renewed).

The foreign professional agency solicits for the passport providing country and exercises strong managerial powers—with a long-term concession or contract assuring substantial returns from the venture. The foreign professional agency structures the passport sales operation and anticipates compliance with its directives. The Malta programme has been formed by Henley & Partners' expertise, developed over a number of years as the exclusive agency for managing the St. Kitts and Nevis programme from 2007 to 2013, and St. Lucia's development was influenced by CS Global Partners' and Arton Capital's broad experience in the global economic citizenship industry.

In 2015 annual contributions to island microstate GDP from foreign professional agency passport sales were 1.8% in Malta (*Malta Today*, 2016), 4.9% in Dominica (IMF, 2016a), and 11.9% in St. Kitts and Nevis (IMF, 2016b). While the foreign professional agency relationship can be viewed as constructed on mutual self-interest of the passport-providing country and the foreign professional agency, there may also be suspicion between them. Questions may arise about: (1) why a foreign company is managing part of a sovereign state's passport sales programme, (2) the foreign professional agency's and scheme's transparency and accountability, (3) inadequate screening of applicants, (4) possible criminality or undesirability of some passport purchasers who might threaten the nation or damage its reputation and existing visa-waiver agreements, (5) the

prostitution of the country's citizenship for the profit of a foreign procurer, (6) the dilution of national identity, and (7) the devaluation of democracy if most voters in the country oppose the arrangement. Income sharing, real economic benefits for the passport-selling country, relative power, and job opportunities for locals are often sources of discord. Relations may be brittle over these issues, and in some cases there may be suspicions that the agency is diverting business to another country that it may represent. There may be pressures within the passport selling country to renegotiate agreements with the foreign professional agency, and opposition parties and international organizations may challenge the legitimacy of the entire foreign professional agency or passport sales concepts. Opposition to how passports are sold may even lead (as in Dominica in February 2017) to mass demonstrations and a riot demanding the government's resignation. A country may exit from any foreign professional agency arrangement and argue that it has its own competence and resources so that it can manage its own passport sales programme domestically.

Sometimes key figures in an opposition party may even threaten to revoke passports and citizenships that have been granted under the foreign professional agency's programme. Often the domestic opposition to foreign professional agency arrangements is fragmented between three fractions: (1) those disagreeing with all passport selling in principle, (2) those merely wanting some amendments to the existing foreign professional agency arrangement, and (3) those wanting to replace the existing foreign professional agency. This may lead to some confusion about where the opposing political forces stand.

In some cases, the incumbent foreign professional agency (or agencies) may be challenged by at least one other foreign professional agency. Competing foreign professional agencies may align themselves with political rivals in the passport selling country, who may question the basis on which the foreign professional agency concession or contract was granted (for example, if the tender was only advertised in the local press rather than in international media). A company that fails to achieve its goal of becoming an authorised foreign professional agency in a country may claim that there was no open tender process and that the victorious rival foreign professional agency or agencies are unprofessional. The loser may allege that its victorious rival(s) created and implemented a poorly designed programme that the loser does not want to market or be in any way associated with. The defeated foreign professional agency stimulates political debates and conflicts within the passport selling country by claiming to be able to rectify the alleged failings of the incumbent foreign professional agency or agencies. There may be accusations within the country that the foreign professional agency is complicit or directly involved in the corrupt enrichment of its political allies (such as assisting or ignoring the illicit diversion of passport revenues into their personal accounts). It may be difficult for an incumbent foreign professional agency to expose or reprimand cheaters if the malefactors are members of the local power elite (such as influential politicians or high-level bureaucrats). An incumbent foreign professional agency attempts to create a political consensus favouring its continued dominance, sometimes by co-opting (potential or actual) powerful political opponents within the country.

Subcultures

Cyprus (since 2011), Antigua and Barbuda (since 2013), Dominica (from 1993 to 2013), and St. Kitts and Nevis (from 1984 to 2006) have operated their passport sales operations most often through *subcultures*. Subcultures are composed of organisations with a substantial and deep presence in these countries themselves (local governments, accounting and trustee companies, lawyers, international banks, and other financial services providers). In the subculture's core is the country's offshore financial centre. The subculture has significant connections with offshore networks around the world and links with a number of governments and transnational regulators. Subcultures seek recognition and approval from other subcultures in eminent offshore financial centres and by the offshore world's most eminent periodical, *Offshore Investment*.

Subcultures frequently disapprove of isolates and berate them for creating unfavourable images in the media concerning economic citizenship and offshore financial centres generally. If an isolate passport sales programme is in a country with an offshore financial centre subculture, there is little integration between the two. In Vanuatu, for example, none of the passport selling organisations is a member of the peak subcultural organisation, the Vanuatu Finance Centre Association (van Fossen, 2015). In a subculture, passport recipients may be anonymous (as in Antigua and Barbuda) and it may not be altogether clear where passport funds are deposited, or why and how much certain subculture members benefit from them. Nevertheless, general accountability and accounting are considerably better in subcultures than in isolates. Unlike the isolate, the subculture has temporal continuity, hierarchical structure, and a relatively complicated division of labour in its governance.

Unlike foreign professional agencies, which may be more narrowly focused on the passport sales programme, subcultures tend to be oriented toward a more varied array of offshore banking, legal, trustee, financial planning, accounting, insurance, and real estate services to which passport sales operations are related. The offshore subculture's members may call on outside consultants for advice, without these outsiders having an enduring privileged role in the country or its offshore community. In this way, Antigua and Barbuda's passport sales programme was created after it sought guidance from Henley & Partners. Firms that have foreign professional agency relationships with other passport issuing countries may also have representative offices in the subculture, without having a privileged foreign professional agency relationship there. Indeed a firm in a subculture with foreign professional agency relationships in other countries may allege that the local subculture's programme is embryonic, obscure, and unnecessarily costly—for example, in Cyprus (Kälin, 2015 pp. 57–59).

Subcultures do not concentrate on fast money so much as they stress the work and perseverance necessary to construct a durable offshore financial centre and passport sales programme. They attempt to master their competitors' successful business models in a complicated field that demands constant research and dedicated efforts for an enterprise's long-term viability. They have special competence to deliver general offshore services and the rewards may be considerable. Cyprus's Interior Minister Socratis Hasikos stated its passport sales programme attracted 3.5 billion euros in foreign investment (4% of GDP) between 2013 and 2016 (Anastasiou, 2017). Antigua and Barbuda's Prime Minister Gaston Browne affirmed that its passport sales programme's contribution to GDP was 14% in 2015 (*Daily Observer*, 2016).

In subcultures, national governmental authorities sell passports principally through licensed agents. These are customarily a cluster of resident trustee corporations, legal and accounting practices, real estate businesses, financial administrators, company registration agents, and company registration firms, with participation from insurance companies and banks. They operate in the country itself but serve foreign customers—even though these local firms may sub-contract to foreign retailers who distribute the passports supplied by the domestic firms and governments.

Expatriates or foreign enterprises may own a minority or majority of the local enterprises involved in passport sales programmes, yet these operations and their resident workers participate in the offshore service providers' local subculture. Every subculture offers important socialisation into rules, laws, techniques, codes, ethics, expectations, and standards of the offshore financial centre. A result is that clients dealing with subcultures (and foreign professional agencies) have more appeal mechanisms than they do with isolates—if they feel that they have been subject to arbitrary or unfair treatment. The subculture often attempts to find solutions to shared problems. The passport sales programme may even be introduced to maintain the loyalty of clients of other parts of the subculture's offshore financial centre. In Cyprus, for example, passports were initially provided concessionally to rich foreign depositors in the country's troubled banks, who had seen some of their money converted into equity in the aftermath of the Global Financial Crisis. Within the subculture there are frequent drawn-out deliberations on the nature and potential of offshore services, creating considerable common understanding of them. The offshore financial centre's legitimating ideas in subcultures are apt to be more complex than in foreign professional agencies

and especially isolates—frequently suggesting a clearer and more elaborate commitment to libertarian capitalist ethics as part of the offshore way of life.

Subcultures are more capable than isolates or agencies of inculcating offshore ideologies throughout the society as a whole and even into the national identity. Legal circles in subcultures may have enormous power over legislation and policy and may often provide lawyers serving in important government positions before, after, and even during the time that they work in the offshore financial centre. Where offshore subcultures grow, there is often little organized domestic opposition to them. People who disagree with offshore operations may be targets for intimidation, retaliation, ostracism, or even expulsion. Because sovereignty is highlighted by offshore subcultures, antipathy to their activities may be seen as insiders' disloyalty or outsiders' illegitimate interference. Paradoxically, subcultures may present selling passports and other offshore services as a defence of sovereignty.

Subcultures are involved in governmental and community activities. The subculture's lawyers assist in writing economic citizenship and other offshore laws and lobby for their passage and implementation. The subculture's companies sponsor, donate, and contribute to local charities. Members may be key figures in local religious organisations. The links between offshore professionals may be loose, or they may be quite formal. A long-established subculture may build an influential network, a relatively unified front to present to outsiders, and a rewarding insiders' marketplace for referrals and offshore commerce favouring the local subculture's members. Subcultures supply a sizeable and coordinated array of offshore sovereignty services. Even though subcultures may display internal competition and even enmity, rarely do their leaders leave them. Subcultures have a high proportion of executives and professionals who are old hands in the offshore business. This subcultural form is more stable than the isolate and foreign professional agency types and the lifespans of the subculture's offshore businesses are generally longer.

Ideally, subcultures allow members to share resources based on trust and cooperation in a community with a long-term local commitment and shared identity. All members are in the same location and have constant interactions, a sense of belonging, and a common emotional experience. The ideal subculture breaks down interorganisational barriers and binds members. Members can outsource some non-core activities to other members who can do them more cheaply and effectively—so that members can build on their strengths and cover their deficiencies. In reality, these subcultures' members may find it difficult to free themselves from blind short-term opportunism (made more acute by the highly individualistic libertarian ideology characteristically found in offshore subcultures). Some members, particularly the larger organisations, may seek to be the core and dominate and peripheralise smaller, weaker members—to make sure that their interests prevail. Furthermore, some domestic members may be allied to or be parts of other (sometimes much larger and more powerful) global organisations outside of the subculture or competing with it—reducing trust, cooperation, and collaboration within the subculture. In short, the subculture's unity may be constantly threatened by contradictions, conflicts, and moves toward fragmentation.

The subculture may be *too local* and inward looking—leading the government to accept a foreign professional agency arrangement to seize foreign opportunities. The foreign professional agency may be seen to offer a superior global strategy, to be more responsive to clients' issues, and to allow the passport country to increase sales in a niche market demanding specialised expertise for the highest levels of success. Foreign professional agencies may also be far more active than subcultures in furthering global trade associations. These trade associations pushed by foreign professional agencies promote the understanding, acceptance, and approval of economic citizenship as well as encouraging symbiotic information sharing, convergent standards of best practice, and mutual self-regulation across passport sales programmes around the world.

The foreign professional agency only takes a niche passport business from an existing subculture. A subculture, however, has a strong tendency toward self-perpetuation. It may reassert its power by deposing a foreign professional agency from its niche, even if the foreign professional agency has done a creditable or superior job—the subculture's members hoping to seize passport sales' profits for themselves.

Conclusion

Each kind of passport sales programme—*isolate*, *foreign professional agency*, and *subculture* (see Table 3)—is an ideal type (Weber, 1922 [1978]). It is distilled from many sources. It is not intended to match all attributes of each case. Instead it suggests analytical form in what otherwise might be a jumble of information. It synthesises a large number of diffuse, separate, more or less present and sometimes missing organisational features—ordered into a unified classification that can be used for analytical purposes. Each type represents family resemblances (Wittgenstein, 1953). That is, each organisational type is a complex network of criss-crossing and overlapping similarities, where it is not necessary for any one feature to be shared by all cases of this type.

Table 3: Types of offshore passport sales institutional organisations.

	Isolate	Foreign Professional Agency	Subculture
Lifespan of Passport Sales Program	Many are short-lived	variable, but can be terminated abruptly if agency links are broken	relatively long
Location within offshore Services Community	Largely outside	indirectly intergrated through the agency	directly intergrated
Range And Internal Integration Of Passport Sales With Other Offshore Services	low	medium	high
Support Networks	low	high but indirect	high and direct
Benefits To Passport Issuing Government	erratic, often windfalls	medium to high	medium to high
Legitimacy (status) Problems	high to extremely high	medium to extremely high	medium to high
Predominant Mode Of Institutional Organisation Of Passport Sales Program By Country Today	Kiribati Marshall Islands Nauru Samoa Tonga Vanuatu	Dominica Grenada Malta St. Kitts and Nevis St. Lucia	Antigua and Barbuda Cyprus

The *isolate* passport sales programme experiences the highest rate of failure, extinction, exit, and discontinuity. It lacks the structure, routines, social relations, and outside links most likely to lead to success. It does not weather storms well.

The *foreign professional agency* style of organisation is relatively stable, but an incumbent *foreign professional agency* may be constantly challenged by rival *foreign professional agencies* or by a local *subculture* that would like to remove the *foreign professional agency* from its privileged position. The *foreign professional agency* arrangement may be an arena for intense political disputes and conflicts within the passport selling country, even if there is (and sometimes there is not) an initial honeymoon period after a *foreign professional agency* takes over the passport sales programme.

The *subculture* has more social connections and experience within the passport selling country than the *foreign professional agency* is likely to have. Consequently an incumbent *foreign professional agency* is likely to be challenged by the local *subculture* for control of passport sales unless the *foreign professional agency* continues to persuade the local elite that it can better serve their interests. One way to do this is to convince them that it has superior professional expertise

and global reach in this particular niche market of economic citizenship. This means that rival foreign professional agencies and subcultures are all competing to learn more about the economic citizenship business and how to be successful in it. Isolates are increasingly squeezed by competition from foreign professional agency and subcultural programmes to supply economic citizenship services, depriving isolates of important potential revenue sources that they may have enjoyed in the past. The undesirable or unsuccessful experiments of isolates in Pacific island countries provide opportunities for learning. In this way countries and organisations can understand what went wrong and avoid making the same mistakes.

The success of small island countries depends mostly on strategy—responding to cues, adapting, and learning—cleverly dealing with their dilemmas, thinking out for themselves, or borrowing clever strategies or best practices from other island microstates in similar situations. Effective strategic management consists of realistic assessments of their possibilities for profitable relations with their mainland hinterlands. It also depends heavily on the island microstate's organisational style (Baldacchino & Bertram, 2009).

Islands have a variety of highly specialised economic structures and active entrepreneurial development strategies. They are like a small number of distinct species adapting into niche opportunities provided by the global economy. Their own particular economic niche personalities create distinctive institutions, policies, and popular mutual understandings. Historical paths have a significant (but flexible) impact on local economic strategies and on adjustments to external opportunities (Bertram & Poirine, 2007).

Isolate passport sales programmes have been most prevalent in island microstates with MIRAB political economies (emphasising eMIgration, high REmittances, high Aid flows, and a highly developed state Bureaucracy, with subsidy-driven international diplomacy). Tonga, Samoa, the Marshall Islands, Kiribati, and Nauru clearly fit here, with Vanuatu (but also the non-isolate Dominica) being intercalary cases with some significant MIRAB features (Bertram, 2013). The Foreign Professional Agency and Subculture passport sales programmes are in island microstates that have a Small Island Tourism Economy (SITE), within the PROFIT (People, Resources, Overseas Management (diplomacy), Finance, and Transport) cluster. PROFIT/SITE economies and polities such as Antigua and Barbuda, Cyprus, Grenada, Malta, St. Kitts and Nevis, and St. Lucia contrast with the MIRAB isolates by having a much lower reliance on aid and remittances, significantly greater affluence, more active and creative international engagement, additional domestic policy flexibility, and a stronger emphasis on supplying a diversified range of high value services and products for mainland clients, with a far more dynamic private sector (Baldacchino & Bertram, 2009; Bertram, 2006; Oberst & McElroy, 2007).

Isolates appear in Pacific island countries that are relatively remote from American, European, and Asian global markets, compared to the Caribbean and European island countries that have organised their passport sales by foreign professional agencies and subcultures. The isolates (being in Pacific island countries) are literally more isolated from world markets than their Mediterranean and Caribbean competitors in the economic citizenship industry. This may be a significant handicap (McElroy & Lucas, 2014). It means, for example, that Pacific island isolates are less accessible visitor locations. This makes it more difficult in Pacific island isolates to integrate passport sales with the local tourism industry—a symbiotic developmental process that foreign professional agencies and local subcultures facilitate in a number of more accessible passport selling destinations in Caribbean and Mediterranean islands.

Island microstates will generally have limited internal resources; continental countries are their hinterlands or alter egos. The most successful small island countries organise themselves effectively to profit from international relations, which are often more significant than internal conditions. Effective organisation is rewarded, but unsuccessful strategic management patterns are difficult to reverse. These situations have long-term impacts.

The economic citizenship industry provides an important instance where smallness often assists the development of clear, flexible, and adaptive strategic directions for taking advantage of

opportunities offered by a fluid international environment and the rich local resource of sovereignty. Niche players on island microstates are able to obtain very high returns by pioneering services that draw heavily on a local political identity that can be sold for high profits to continental clients in a global market.

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